



July 29, 2020

Tyneshia Tate  
Environmental Engineer  
Stationary Source Permitting Program  
Georgia EPD - Air Protection Branch  
4244 International Parkway, Suite 120  
Atlanta, Georgia 30354

Re: Off-Permit Change  
PQ Corporation  
Permit No. 2819-245-0052-V-03-0

Dear Ms. Tate:

PQ Corporation owns and operates two manufacturing facilities operating under Permit No. 2819-245-0052-V-03-0. One of the facilities, Potters Industries, Inc. (Potters), an affiliate of PQ Corporation, proposes changes to its existing baghouse control systems. The changes are intended to improve operation and maintenance for the affected equipment. The proposed projects are exempt from Georgia's construction permit program, and qualify for off-permit change procedures pursuant to Georgia Air Quality Control Rule 391-3-1-.03(10)(b)6. This communication is intended to provide the requisite agency notification.

- 1) Description of the changes:
  - Replacement of baghouse BH-801 with a new unit with similar or improved efficiency; and,
  - Addition of an optional re-route to baghouse BH-600 for dust collectors DC-1, DC-2, and DC-3, which handle emissions from Q-Cel Packaging Lines 1 through 4, and which are currently routed only to baghouse BH-300.
- 2) Potters intends to implement these changes during Fourth Quarter 2020.
- 3) The baghouses control particulate emissions from Potters' manufacturing operations.
- 4) The proposed changes do not result in any change in potential emissions from the facility, as allowable control efficiencies and throughputs will remain the same.
- 5) No new applicable requirements will apply as a result of the change.

The affected baghouses and controlled operations will continue to meet all applicable requirements, and will not violate any existing permit term or condition.

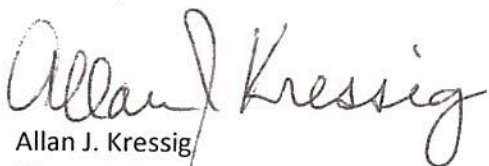
The new BH-801 will replace the current horizontal cartridge collector design with a vertical unit to minimize maintenance required on the unit. Based on PQ's review, this change is exempt from SIP permitting as a pollution control project (PCP) per Georgia Rule 391-3-1-.01 (qqqq).

PQ understands that the proposed baghouse re-route is exempt from construction permitting per Georgia Rule 391-3-1-.03 (6)(i)(5):

*Changes in a process or process equipment which do not involve installing, constructing, or reconstructing an emission unit or the primary air cleaning device of an air pollution control system provided that such changes do not result in the increase of emissions from any emission unit or the emissions of a pollutant not previously emitted.*

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. If you have any questions, please contact Joe Lala of our staff at (610) 447-3933 or [Joe.Lala@pqcorp.com](mailto:Joe.Lala@pqcorp.com).

Sincerely,



Allan J. Kressig  
Site Manager

PQ Corporation and Potters Industries

cc: U.S. EPA Region 4  
Operating Source Section  
Air and Radiation Technology Branch  
61 Forsyth Street  
Atlanta, Georgia 30303